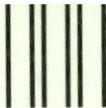


UNITED STATES POSTAL SERVICE

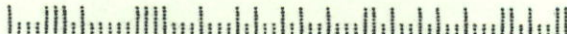


First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

● Print your name, address, and ZIP Code in this box ●

U.S. ENVIRONMENTAL PROTECTION  
REGION III (3HW100)  
841 CHESTNUT BLDG.  
PHILADELPHIA, PA 19107

ATTN: ZELMA MALDONADO  
(3HW100)



**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☒ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

**3. Article Addressed to:**

Mr. Bill Rodgers  
 Bill-Dry Corporation  
 Howell Office  
 3505 West Grand River  
 Howell, MI 48843

**4a. Article Number**

P 549 557 163

**4b. Service Type**

- |   |   |
|---|---|
| <input type="checkbox"/> Registered                     | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail                   | <input type="checkbox"/> Insured              |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD                  |

**7. Date of Delivery**

9-3-96 MBRLD

**5. Received By: (Print Name)****8. Addressee's Address (Only if requested and fee is paid)****6. Signature: (Addressee or Agent)**

X C.M. Sperry

7  
100-11171

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

AUGUST 29, 1996

Mr. Bill Rodgers  
Bil-Dry Corporation  
Howell Office  
3505 West Grand River  
Howell, MI 48843

Dear Mr. Rodgers:

Pursuant to the authority granted to the United States Environmental Protection Agency under Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6927(a), which provides in relevant part that "...any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, .. furnish information relating to such wastes..." (emphasis added), EPA hereby requests that you furnish to EPA by **September 13, 1996** the information and documents described below. The information and documents requested relate to Bil-Dry's facility located at 5525 Grays Avenue, Philadelphia, Pennsylvania (hereinafter "Facility").

1. For each container of material which is now, or was at any time since acquisition of the Facility by Bil-Dry, stored in the open roofed structure or connecting open yard located between the blue metal manufacturing building at the Facility and the nearby SEPTA railroad tracks (hereinafter "such container(s)"), please provide the following information:

a. The identity (by commercial name, chemical name and/or EPA Hazardous Waste Code (see 40 CFR Part 261, Subparts C and/or D, (copy attached)) and amount (by volume and number of containers) of the contents of each such container.

b. the use of the contents of each such container, in Bil-Dry's production processes.

c. the generator or producer of the contents of each such container;

d. the date of acquisition of the contents of each such container by Bil-Dry.

e. the person or entity from whom Bil-Dry acquired the contents of each such container;

f. The purpose for which or the reason why the contents of each such container was acquired by Bil-Dry;

g. the date of use of the contents of any such container at the Facility, the identity of such contents (commercial product name, chemical name or EPA Hazardous Waste Code), the purpose for which such contents were used, and the amount so used;

h. the condition of each such container at the time it was acquired by Bil-Dry (i.e., was the container dated, labeled, in good condition, rusted, leaking, open, sealed, etc.?);

i. The condition (as defined in Request #1.h., above) of each such container immediately prior to the inspection of the Facility conducted by the Pennsylvania Department of Environmental Protection ("PADEP") on April 1, 1996;

j. The current condition (as defined in Request #1.h., above) of each such container;

k. The duration of storage of each such container at the Facility and the purpose of such storage;

l. the date of any sampling or analysis of the contents of each such container (regardless of the purpose of such sampling or analysis) and the results of any such sampling or analysis;

m. the date and results of any hazardous waste determination (as described in PA Code Section 75.261 (b)) performed on the contents of each such container; and,

n. the name and address of each person or entity who performed any sampling, analyses or hazardous waste determination described in Request # 1.l. or 1.m., above.

2. Please furnish to EPA a copy of each document in the possession, custody or control of Bil-Dry or its agents which contains or otherwise relates to the information requested in Request #1, above.

3. For each shipment of the contents of any such containers from the Facility, please provide the following information:

a. The date of such shipment;

b. The identity of the material shipped (i.e., name of commercial product, chemical name and/or EPA Hazardous Waste Code);

c. The amount (by volume and number of containers) shipped;

d. The purpose of such shipment (i.e., treatment, storage, disposal, recycling, sale. etc.);

e. The name, address and EPA Identification Number (if any) of the shipper/transporter; and,

f. The name, address and EPA Identification Number (if any) of the person or entity to whom the shipment was delivered.

4. Please furnish to EPA a copy of each document in the possession, custody or control of Bil-Dry or its agents which contains or otherwise relates to the information described in Request #3, above.

5. Please furnish to EPA the name and address of each person employed by Bil-Dry since Bil-Dry acquired the Facility who has or had contact with or responsibility for the contents of any such containers (or the containers themselves) stored at the Facility. Please also describe the nature of such contact or responsibility.

6. Please furnish to EPA a copy of each document in the possession, custody or control of Bil-Dry or its agents which contains or otherwise relates to the information described in Request # 5, above.

7. During an inspection of the Facility by EPA on April 9th and 10th, 1996, EPA inspectors observed a large number of unlabeled drums. Please explain how, in the absence of labeling, Bil-Dry can determine what materials are in what drums.

8. Please furnish to EPA a copy of each document in the possession, custody or control of Bil-Dry or its agents which contains or otherwise relates to the information described in Request # 7, above.

9. Please furnish to EPA a copy of each document which describes or relates to the purchase of the Facility and/or any equipment or objects located at the Facility, including such containers, by Bil-Dry, including any agreements of sale, deeds or receipts relating thereto.

10. Please describe any spills, leaks, or releases of the contents of such containers or of any materials known or believed to be solid wastes at the Facility since Bil-Dry acquired the

Facility, whether or not such spill, etc., was of a reportable quantity. Please also describe any measures taken by Bil-Dry to address any such spill, etc.

11. Please furnish to EPA a copy of each document in the possession, custody or control of Bil-Dry or its agents which contains or relates to the information described in Request # 10, above.

12. Please describe all measures taken by Bil-Dry to address the concerns identified by PADEP in its letter to Bil-Dry dated June 14, 1996.

13. Please furnish to EPA a copy of each document in the possession, custody or control of Bil-Dry or its agents which contains or relates to the information described in Request #12, above.

14. Please explain the significance of storage of some of such containers in the roofed structure, some on the left side of the open area, and some on the right side of the open area at the Facility.

15. Please furnish to EPA a copy of each document in the possession, custody or control of Bil-Dry or its agents which contains or relates to the information described in Request #14, above.

16. Referring to the Report of EPA's inspection of the Facility in April 1996 (see attached copy), please identify the materials (by commercial product name, chemical name or EPA Hazardous Waste Code) identified as EPA Drums #1 - #7.

17. Please furnish to EPA a copy of each document in the possession, custody or control of Bil-Dry or its agents which contains or relates to the information described in Request #16, above.

18. Please indicate whether Bil-Dry has ever made a hazardous waste determination, as described in Pa. Code Section 75.262(b) (copy attached) for the contents of any of the containers of material stored at the Facility since Bil-Dry acquired the Facility. Please include:

- a. the date of each such determination;
- b. the container for which such determination was made;
- c. the contents of such container;
- d. the amount of material in such container at the time of such determination.
- e. the location of the container at the time of such determination and at this time.

19. Please indicate whether Bil-Dry has provided any training or maintained records of any training, as described in Pa Code Section 75.265(f), at any time since the acquisition of the Facility by Bil-Dry. Please describe all such training, including the dates of such training and the names and job titles of each person trained.

20. Please furnish to EPA a copy of each document in the possession, custody or control of Bil-Dry or its agents which contains or relates to the information described in Request #19, above.

21. In the inventory of containers located on the third floor of the production building which you furnished to PADEP, please indicate the unit of measurement (e.g., gallons) of each of the quantities of materials referred to in the "Quantity" column.

Failure to provide the information requested or to fail to explain adequately the basis for such failure may constitute a violation of Section 3007(a) of RCRA and may result in enforcement action and the imposition of civil penalties of up to \$25,000 per day, and/or criminal fines of up to \$50,000 per day and/or up to two years imprisonment, for each day of violation, see Sections 3008(a), (d), and (g) of RCRA, 42 U.S.C. Section 6928(c), (d), (g).

You are entitled to assert a claim of business confidentiality covering any part of the information, in a manner described in 40 CFR Section 2.2.03(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 CFR Part 2, Subpart B. Unless a claim is asserted and substantiated at the time requested information is submitted, EPA may make this information available to the public without further notice to you.

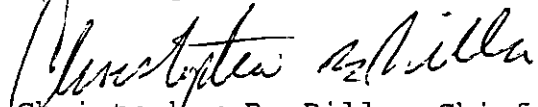
This information collection request is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. Section 3501-3502.

Please send the requested information by September 13, 1996 to:

U.S. Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107  
Attn.: Zelma Maldonado (3HW100)

If you have any questions concerning this matter, please contact Zelma Maldonado from my staff at (215) 566-3448.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christopher B. Pilla".

Christopher B. Pilla, Chief  
PA Corrective Action/Enforcement

Attachments

1. Subpart C and D of 40 CFR Section 261
2. Compliance Enforcement Inspection Report of April 9 & 10, 1996
3. Section 262(b) of Pa Code

cc: M. Coe (3RC32)